

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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MATTHEW LABREC,

Plaintiff,

SPECIAL VERDICT

v.

SALAM SYED and TRISHA ANDERSON,

19-cv-804-jdp

Defendants.

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We, the jury, for our special verdict, do find as follows:

CLAIMS AGAINST TRISHA ANDERSON

QUESTION 1. Did defendant Trisha Anderson violate plaintiff Matthew LaBrec's rights under the Eighth Amendment on September 27, 2016 or October 12, 2016?

Answer: NO (Yes or No)

Answer Question 2.

QUESTION 2. Was defendant Anderson negligent in providing medical care to plaintiff LaBrec on September 27, 2016 or October 12, 2016?

Answer: NO (Yes or No)

*If you answered YES to Question 2, answer Question 3. If you answered NO to Question 2, do not answer Question 3, and go on to Question 4.*

QUESTION 3. Was defendant Anderson's negligence a cause of injury to plaintiff LaBrec?

Answer: \_\_\_\_\_ (Yes or No)

*If you answered YES to Question 1 OR Question 3, answer Question 4. If you answered NO to Question 1 AND Question 3, do not answer Question 4, and go on to Question 6.*

**QUESTION 4.** What amount of money, if any, would fairly and adequately compensate LaBrec for the harm caused by Anderson?

Answer: \$ \_\_\_\_\_

*If you answered YES to Question 1, answer Question 5. If you answered NO to Question 1, do not answer Question 5, and go on to Question 6.*

**QUESTION 5.** What amount of money, if any, do you award as punitive damages against Anderson?

Answer: \$ \_\_\_\_\_

*Answer Question 6.*

#### **CLAIMS AGAINST SALAM SYED**

**QUESTION 6.** Did defendant Salam Syed violate plaintiff LaBrec's rights under the Eighth Amendment between April 2018 and August 2018?

Answer: NO (Yes or No)

*Answer Question 7.*

**QUESTION 7.** Was defendant Syed negligent in providing medical care to plaintiff LaBrec between April 2018 and August 2018?

Answer: NO (Yes or No)

*If you answered YES to Question 7, answer Question 8. If you answered NO to Question 7, do not answer Question 8, and go on to Question 9.*

QUESTION 8. Was defendant Syed's negligence a cause of injury to LaBrec?

Answer: \_\_\_\_\_ (Yes or No)

*If you answered YES to Question 6 OR Question 8, answer Question 9. If you answered NO to Question 6 AND Question 8, STOP and do not answer any more questions.*

QUESTION 9. What amount of money, if any, would fairly and adequately compensate LaBrec for the harm caused by Syed?

Answer: \$ \_\_\_\_\_

*If you answered YES to Question 6, answer Question 10. If you answered NO to Question 6, STOP and do not answer any more questions.*

QUESTION 10. What amount of money, if any, do you award as punitive damages against Syed?

Answer: \$ \_\_\_\_\_

  
Presiding Juror

Madison, Wisconsin

Date: FEB 15, 2023